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***Lead Counsel for the  
Indirect Purchaser Plaintiffs***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Master File No. CV-07-5944-JST

MDL No. 1917

This Document Relates to:

## All Indirect Purchaser Actions

**DECLARATION OF LAUREN C. CAPURRO  
IN SUPPORT OF INDIRECT PURCHASER  
PLAINTIFFS' ADMINISTRATIVE MOTION  
PURSUANT TO L.R. 7-11 FOR LEAVE TO  
FILE EXCESS PAGES IN RESPONSE TO  
OBJECTIONS TO JANUARY 28, 2016  
REPORT AND RECOMMENDATION OF  
SPECIAL MASTER**

Hearing Date: March 15, 2016

Time: 2:00 p.m.

Judge: Honorable Jon S. Tigar

Court: Courtroom 9, 19th Floor

## Special Master Martin Quinn, JAMS

DECLARATION OF LAUREN C. CAPURRO IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS'  
ADMINISTRATIVE MOTION PURSUANT TO L.R. 7-11 FOR LEAVE TO FILE EXCESS PAGES IN RESPONSE  
TO OBJECTIONS TO JAN. 28, 2016 R&R  
Master File No. CV-07-5944-JST

1 I, Lauren C. Capurro, declare as follows:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice  
3 before this Court. I am an associate with the law firm Trump, Alioto, Trump & Prescott, LLP and my  
4 firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in the above-captioned  
5 action. I submit this declaration in support of IPPs’ Administrative Motion Pursuant to L.R. 7-11 for  
6 Leave to File Excess Pages In Response to Objections to January 28, 2016 Report and  
7 Recommendations of Special Master (“R&R”) (“Administrative Motion”). I have personal knowledge  
8 of the facts stated herein, and I could and would competently testify thereto if called as a witness.

9 2. IPPs have moved for final approval of seven settlements and for attorneys’ fees,  
10 reimbursement of expenses, and incentive awards for class representatives. Special Master Quinn has  
11 issued a 77-page R&R addressing these motions. Nine separate objections to the R&R have been filed.

12 3. IPPs intend to file one Response that will address all the objections to the R&R  
13 regarding (1) settlement approval; and (2) attorneys’ fees, expenses, and incentive awards. Given the  
14 complexity of the issues and the length of the arguments presented in the objections, IPPs need seventy  
15 (70) pages in order to fully address the objections.

16  
17 I declare under penalty of perjury that the foregoing is true and correct. Executed on February  
18 22, 2016, in San Francisco, California.  
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21 s/ Lauren C. Capurro  
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24 Lauren C. Capurro  
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